PART
Plan of Action for Regional Transit
Northeastern Illinois

Memorandum

To: Erin Aleman

From: CMAP staff

Date: September 18, 2023

Subject: Use of existing federal highway funding for transit

Executive summary

Many of the PART recommendations related to addressing the transit fiscal cliff focus on funding sources that are specific to the regional transit system, such as fares and the RTA sales tax. However, the transit system is part of the broader regional transportation network. The state should consider how broader transportation system funds, including those provided by the federal government, could support critical investments in the regional transit system.

While the state and regional funding agencies do leverage some federal highway funds in support of transit, there are significant opportunities to expand on these efforts. Many peer states with large transit systems make much greater use of highway funds to support transit, enabling them to make progress toward important climate and equity goals.

The state should consider several strategies related to the use of existing federal highway funds in support of transit:

- **IDOT should advance multimodal goals through its own projects.** With its existing funds and programs, IDOT could invest funds to support improvements to regional bus operations on its own roadways. This would accelerate the implementation of related PART recommendations on faster and more reliable buses and recognize the important relationship between the success of transit and other users of the roadway.
- **Increase the use of highway funds for transit investments.** State and local transportation stakeholders should consider strategies to "flex" federal highway funds

to support transit investments. Transit providers could leverage these funds to advance complementary PART recommendations and address funding needs.

- **Investigate additional tools to leverage federal funds**. The state should consider additional strategies to maximize the potential of federal funding, including the use of tools such as Transportation Development Credits and State Infrastructure Banks.

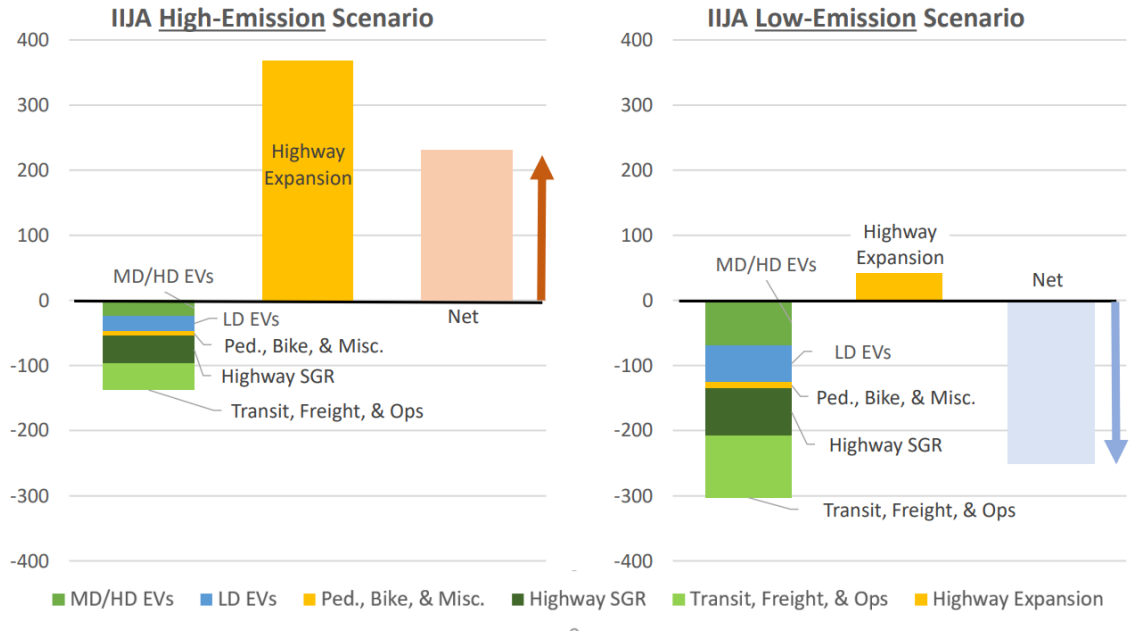
Federal highway and transit funding formulas should be updated

The Federal-Aid Highway Program (FAHP) is a group of programs funded by the Federal Highway Trust Fund that finance federal highway and transit spending. This fund was historically funded almost entirely by federal gas and diesel taxes, which have not been increased since 1993. Congress has filled the gap between revenues and outlays with general funds since 2008. The Congressional Budget Office (CBO) projects the gap will grow from a quarter of the program in 2023 to half in 2028.[1] Federal aid supports several programs directed at specific transportation purposes such as safety, bridge condition, and congestion. These funds account for about 25 percent of government spending on transportation infrastructure, with states and local governments funding the rest.

The Highway Trust Fund is split into two accounts: highway and transit, with highway receiving about 80 percent of funds and transit receiving 20 percent. While revenues from road users once supported both accounts, today' the gas tax is insufficient to cover even highway spending – a gap that is projected to grow. This reality undercuts the idea that road funds follow a "users pay" system. In other words, the common belief that roadway users alone fund highway investments through the gas tax is, and has been since the 1990s, untrue. While the topic of increased federal transportation funds for highway and transit use is beyond the scope of this memo, CMAP recommends that the use of federal transportation funds should reflect current needs, rather than formulaic funding of specific modes. This process by which funds are moved from one program to another is called "flexing."

The Infrastructure Investment and Jobs Act (IIJA) increased federal transportation funding by 30 percent. Some states and regions are moving towards rebalancing funds to support a more multimodal system, but funding opportunities remain greatly imbalanced towards roads and roadway expansion. An analysis by Georgetown Climate Center of IIJA demonstrates that the choices states make in their IIJA investments will determine if the IIJA is a net positive or negative for emissions.[2] If states use their discretion to expand existing highway capacity, emissions will continue to grow for the foreseeable future. However, if these funds are used to shift transportation to lower emitting options, such as transit, biking, walking, and electrification, the IIJA funds may improve the transportation system's ability to lower emissions (Figure 1).

Figure 1: Emissions impact of different uses of IIJA funding from Georgetown Climate Center



Source: Georgetown Climate Center 2021 Federal Infrastructure Investment Analysis

It is critical that federal transportation funding (like IIJA) be invested wisely in all regions, especially in northeastern Illinois where population growth remains relatively flat while significant amounts of underused infrastructure exist in areas with infill opportunities. ON TO 2050, the region's comprehensive plan, calls for a "bold steps toward a well-integrated, multimodal transportation system." Maintaining the status quo will continue to move the region away from the plan's goals on a variety of regional livability goals/metrics including greenhouse gas (GHG) emissions, environmental justice, congestion, accessibility, and resilience. Federal rules recognize the need to match highway and transit funding to local needs by allowing up to 50 percent of funds to be flexed to other programs. Illinois can flex more; many peer states flex as much as five times more funding to transit.

Recommendations

The state should consider several reforms that would increase investments in regional transit, including:

- Use existing highway funds to make transit-supportive investments on the road system.
- Flex federal highway funds to transit needs.
- Investigate additional tools to leverage federal funds, such as Transportation Development Credits and State Infrastructure Banks.

Recommendation: IDOT should advance multimodal goals through its own projects

Illinois Department of Transportation (IDOT) receives funding from state and federal sources to build and maintain the transportation system – which includes roadways, freight rail, bike trails and transit. Roads are used by trucks, bikes, pedestrians, personal vehicles, and buses. Recent action at the state level[3] has directed IDOT to embrace investment in bike and pedestrian infrastructure – despite their lack of contribution to the gas tax. Similar bold action should direct IDOT to make investments into buses and transit infrastructure. This new use of existing state funds would support the complementary recommendations in the companion PART memo on enabling faster and more reliable bus service (available on the PART webpage).

IDOT participation is key to a multimodal network, as IDOT owns and maintains many of the arterial roads on which buses operate. Despite IDOT's role in the arterial road system, transit agencies must use their own capital funds to improve IDOT's facilities to meet their needs. In addition, IDOT's policies do not have documented procedures for bus infrastructure, resulting in delays and increased local costs. As noted in the companion PART memo on bus priority, adding transit accommodations to IDOT's Bureau of Design and Environment Manual (BDE) would facilitate a more productive relationship between IDOT and transit operators across the state. These shifts should be accompanied by funding support. It makes sense that bus-supportive improvements to IDOT owned and managed traffic signals, bus stops, curbs and other roadway infrastructure should be constructed with roadway improvement funds currently programed by IDOT. Because these purposes have already been deemed eligible for federal roadway improvement funds, no flexing or transfers would be necessary.

One example of how additional highway funds can benefit regional transit can be seen in the challenges faced by Pace in implementing upgrades to IDOT's roads as part of its Arterial Rapid Transit (ART) network. Often, the most expensive part of a program like ART are the improvements needed at intersections and signals, which are usually owned and operated by IDOT. The upgrades needed to modernize traffic signals are currently funded with transit funds, but often benefit all road users, not just buses. Other core ART infrastructure improvements improve the safety and accessibility of pedestrians, such as better crossings and wider sidewalks – all of which are eligible for IDOT's federal highway funds. Acknowledging this

intersection, IIJA expands the number of bus enhancements eligible for STBG (Surface Transportation Block Grant) without flexing[4].

Some of the most significant opportunities exist for regional bus networks, but other transit investments are also eligible for direct IDOT investments. For example, IDOT can support safety improvements at rail-highway grade crossings. As noted above and in the companion memo on system accessibility, IDOT and other state and local agencies can also invest in complementary pedestrian infrastructure (e.g., sidewalks and curb cuts) that allow riders to access bus stops and rail stations.

With its expansive experience managing the state arterial network, IDOT is often best positioned to implement multimodal improvements. IDOT owns the facilities, programs the funds, and has access to capable engineers and contractors critical to the implementation of these improvements. IDOT and other large transportation programming agencies such as counties and the Chicago Department of Transportation should use the resources they have in alignment and coordination with transit agencies, MPOs and other partners to improve support for all modes.

Evaluation

Policy

Category	Rating	Rationale
Mobility	High	Refocusing federal transit funds on mobility outcomes in addition to moving cars alone will result in better outcomes for many users. Many transit investments also benefit drivers – such as modernized signals.
Equity	High	Car drivers on average are higher income. More robust support for non-car modes will benefit low-income or otherwise vulnerable populations.
Revenue sustainability	Medium	There are significant funds available for transportation capital investments. However, there are also significant capital needs on both the road and transit system, and the existing state capital bill (Rebuild Illinois) will expire in the coming years.
Environment	High	Increased state-funded investments in transit infrastructure supports a shift away from single

		occupant vehicles (SOV) which is a critical step towards meeting environmental goals.
Economy	Medium	Better travel time reliability resulting from improved transit is anticipated to improve the consistency of workers' journeys to work, supporting the needs of both workers and firms.
Regional benefit	Regional	Additional collaboration and coordination between agencies would enable better outcomes across the transportation system.

Process

Category	Rating	Rationale
Administrative feasibility	High	IDOT has the authority to invest federal and state transportation funds in transit-supportive uses on its facilities today. Full implementation will require process improvements and a culture shift towards the creation and funding of multimodal goals.
Political feasibility	Medium	There are vested interests in the traditional allocations and uses of transportation funds.
Timing	Medium	IDOT plans and programs projects several years into the future.
State span of control	High	The state can instruct IDOT to embrace, further, and oversee the implementation of multimodal goals.

Implementation steps

- The ILGA could direct IDOT to add transit supportive guidance to IDOT's Bureau of Design and Environment Manual (BDE), potentially as part of the statewide transit plan.
- The ILGA could also direct that Metropolitan Planning Organizations (MPOs) be afforded greater say in how federal highway funds are invested, as is done in Pennsylvania and California.

- The legislature could direct IDOT to look at additional opportunities to support transit by, among other things, investing in additional staff or financial commitments to transit infrastructure.
- IDOT would implement this activity with cooperation of transit agencies, MPOs, and municipalities.
- From a regional standpoint, CMAP could set investment dollar targets, by mode, through the long-range transportation planning process, both within the financial plan for transportation and regionally significant project selection elements. Large, regional, transportation programmers could also hire staff specifically focused on the needs of multimodal users.

Challenges

- The use of federal funds often requires a local match.
- IDOT may not currently appreciate or understand the needs of transit agencies in sufficient depth to operationalize improvements, pointing to the need for ongoing partnerships.

Recommendation: Increase the use of highway funds for transit investments

The federal government gives states more than 90 percent[5] of highway funds using formulas based on each state's contribution to the highway trust fund. "Federal highway fund flexing" refers to a mechanism that allows states to use a portion of their allocated federal highway funds for eligible non-highway transportation projects. This process recognizes that diverse transportation needs, such as transit, biking, and walking infrastructure, can play a significant role in improving mobility, reducing congestion, enhancing air quality, and promoting sustainable transportation options.

Flexing funds to transit is an available option to improve travel in many corridors in the CMAP region. Adding lanes to urban expressways would have significant financial and social costs, while adding bus and train service to the same corridor would cost significantly less and have positive social and environmental impacts.

Programs eligible[6] for flexing include:

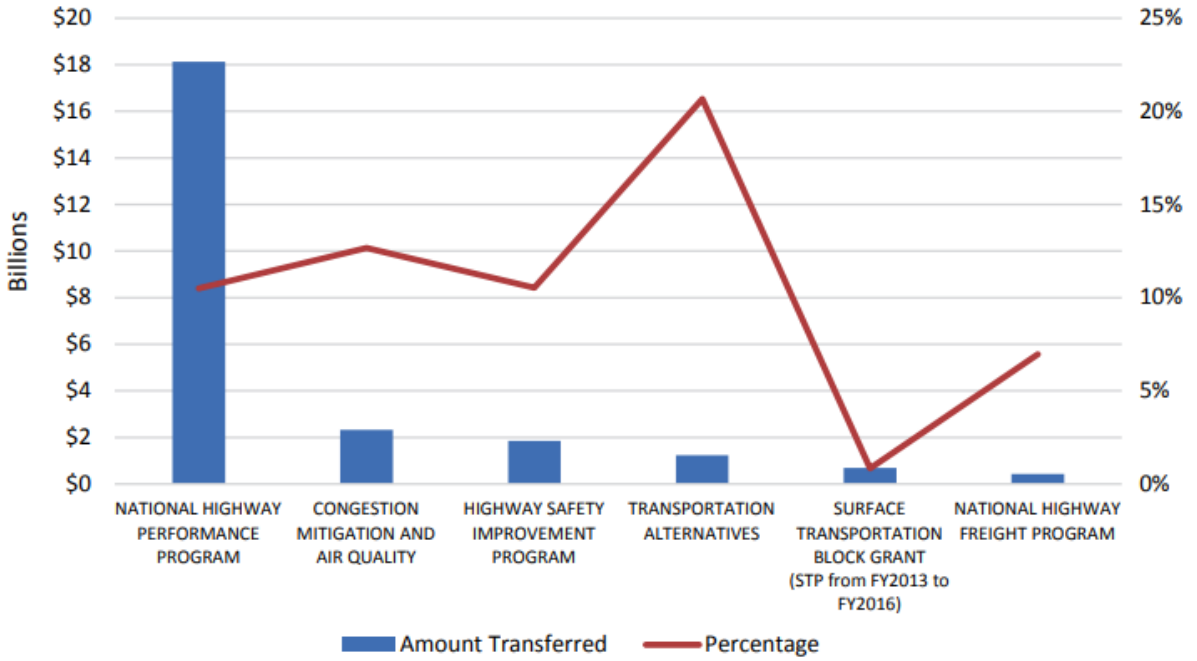
- NHPP – National Highway Performance Program
- STBG – Surface Transportation Block Grant Program
- HSIP – Highway Safety Improvement Program
- CMAQ – Congestion Mitigation and Air Quality
- TA – Transportation Alternatives
- NHFP – National Highway Freight Program
- CR – Carbon reduction (new)

- Ferry Boat Program
- SPR – State Planning and Research

See Appendix 2 for current Illinois funding levels.

Nationally, $4 billion in transportation funds were transferred among programs in 2019. Funds tend to be transferred from more restrictive programs to more permissive ones. For this reason, 84% of flexed funds are transferred into Surface Transportation Block Grant (STBG) programs.[7] The share of funds transferred varies by state, with some transferring little and others transferring the maximum amount allowed. Transfers are often used to fully obligate the federal program, meet state programmatic goals, and avoid potential recissions. Nationally, $18 billion in federal transportation dollars (10% of the total available) were transferred away from the more restrictive National Highway Performance Program (NHPP) from 2013 to 2020, making it the largest source of flexed funds.[8]

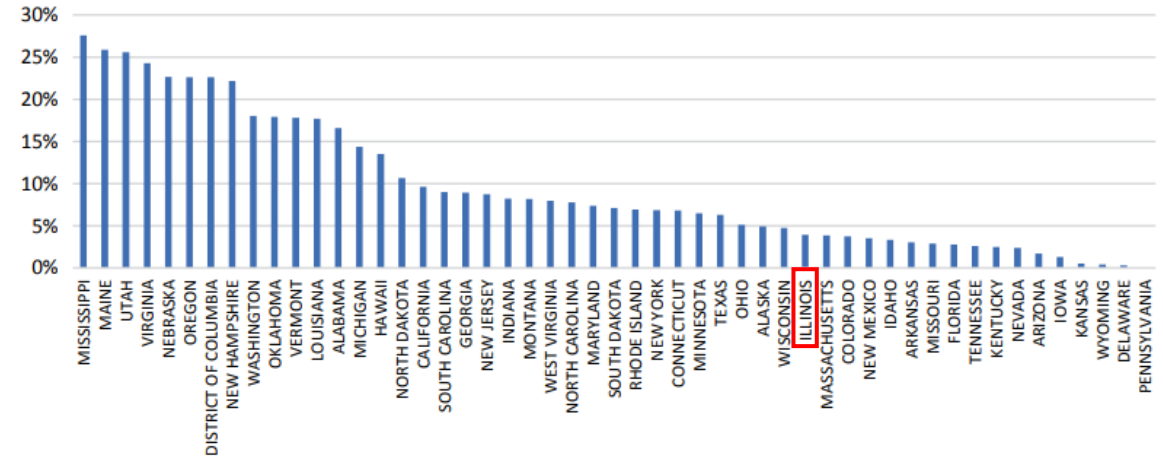
Figure 2: Total transfers among highway program categories and percent transferred, 2013-20



Source: TRB National Cooperative Highway Research Program 2022 Research Report 1023

Funds can be flexed between Federal Highway Administration (FHWA) programs or out of FHWA to Federal Transit Administration (FTA) programs. Illinois flexes less than 5 percent of its funds from one highway program to another highway program. Thirty-four other states flex more highway funding than Illinois.[9]

Figure 3: Percent of highway funds flexed among highway programs by state, 2013-2020

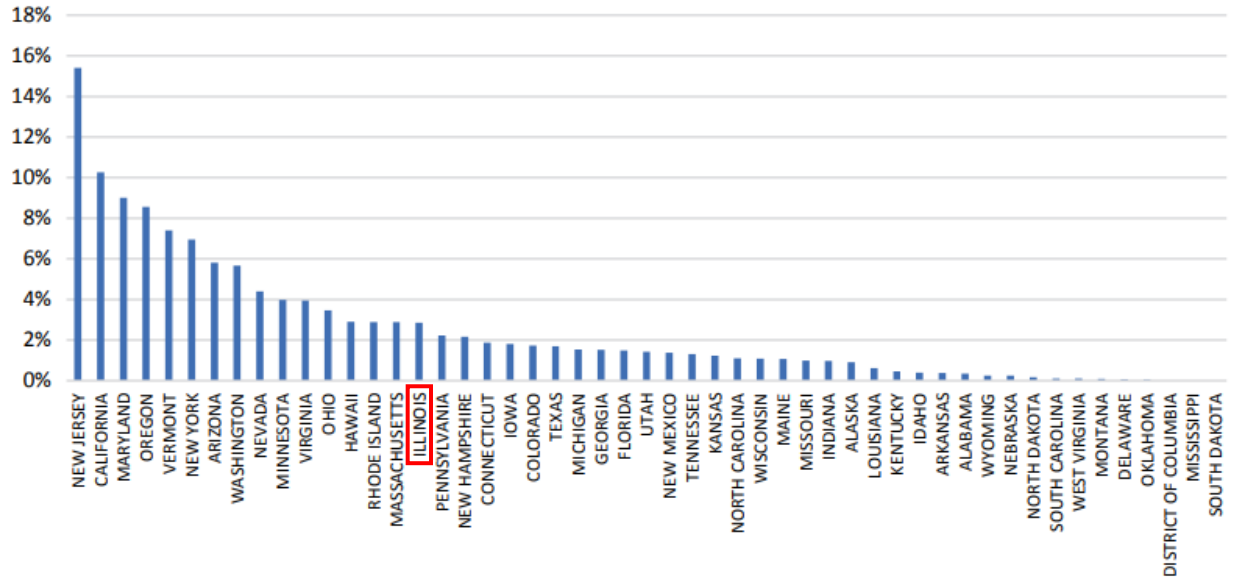


Source: TRB National Cooperative Highway Research Program 2022 Research Report 1023

In addition to flexing funds between highway programs, states can flex funds out of highway programs to transit programs. Fifteen states flex more funding from highway programs to transit programs than Illinois.[10] Many states with large transit systems, such as New York, California, New Jersey, and Massachusetts, all flex more to transit than Illinois. While Illinois only flexes roughly 2 percent of its highway funds to transit, this share is as high as 10 percent in California and nearly 16 percent in New Jersey. In the Chicago region, CMAP programs the CMAQ program, a major source of funds flexed from highway to transit. One benefit of flexing funding to transit, even for expenses that are otherwise covered by highway programs, is that the FTA is often more familiar with certain types of infrastructure such as rail station improvements, making administration and oversight more efficient.

Fifteen states flex more funding from highway programs to transit programs than Illinois.

Figure 4: Percent of highway funds flexed to transit by state, 2013-2020



Source: TRB National Cooperative Highway Research Program 2022 Research Report 1023

Limits on flexing

Limits exist on the amount of transportation funds that can be flexed at a given time. Generally, the ability to flex federal transportation funds is limited to 50 percent of apportionment funds for each program. Certain funds are set aside for specific uses, such as border infrastructure, and cannot be flexed. The state of Illinois is not meeting its bridge, pavement, and safety targets, which triggers additional reporting requirements and puts additional limits on the state's ability to flex transportation dollars from roads to transit. The state's inability to meet these targets would limit its ability to flex funds from both NHPP and the Highway Safety Improvement Program (HSIP)[11]. In addition to statutory mandates, perception can limit the ability to flex federal transportation funds. For example, the act of transferring funds from the Highway Safety Improvement Program could raise concerns about a state's commitment to safety.

Eligibility requirements can also serve to limit the flexibility of certain funds. For example, funds transferred from the FHWA to FTA can be used only for purposes eligible under both the original program from which the funds are transferred and the program to which the funds are transferred.[12] This generally limits flexed funds to capital improvements. The list of potential capital improvements is quite extensive, and can include vehicles, planning, engineering, crime prevention and security equipment, mobility management, workforce development, stations, track, expansion, and a category of expenses known as "preventative maintenance.".

The last category of expenses – preventative maintenance – is especially important to discussions relating to ongoing operating funding shortfalls. Although practices vary, these expenses are often funded through agency operating budgets. By offsetting existing transit operating funds with flexed highway funds, transit providers could make those operating funds available for other operating expenses.

Furthermore, additional flexibility does exist. For example, CMAQ, an FHWA fund dedicated to reducing congestion and improving air quality, may be used for the operation of new or expanded transit service, but not for existing service. Notably, IIJA removed certain restrictions that could, potentially, allow the CMAQ program to direct more capital highway funds for transit operations than have been allowed in the past.[13]

Examples

- In 1997, the State of California enacted changes to its allocation approach for federal highway funds. The new process provides Regional Transportation Planning Agencies (i.e., MPOs) with the authority to allocate 75 percent of federal transportation funds. The projects selected are ultimately approved by the California Transportation Commission rather than the state DOT (Caltrans).[14]
- Since 1997, Pennsylvania has flexed $25 million of FHWA funds to transit every year based on an agreement between PennDOT and MPOs.[15] The Southeastern Pennsylvania Transportation Authority (SEPTA) and the Port Authority received 95 percent of those funds. In addition, Pennsylvania MPOs in transfer an additional $45 million a year from FHWA to FTA to support transit.[16]

Evaluation

Policy

Category	Rating	Rationale
Mobility	High	Highway funds flexed to FTA can be used for a wide variety of projects.
Equity	High	Car drivers on average are higher income. More robust funding support for non-car modes could benefit low-income or otherwise vulnerable populations.
Revenue sustainability	High	Federal transportation funding is a stable and reliable ongoing source.
Environment	High	Shifting away from single occupant vehicles (SOV) is critical to meeting environmental goals.

Economy	Medium	Investing in transit is often more cost effective than additional roadway capacity.
Regional benefit	Regional	Additional collaboration and coordination between agencies would enable better outcomes across the transportation system.

Process

Category	Rating	Rationale
Administrative feasibility	Medium	Limits exist on the state's ability to flex highway funds to transit. Future IDOT or federal rule changes could disrupt funding.
Political feasibility	Medium	There are vested interests in the historic system and division of road funds.
Timing	Medium	IDOT plans and programs projects several years out.
State span of control	High	The state has authority to instruct IDOT to flex federal funding up to statutory limits.

Implementation steps

- The ILGA could direct that Metropolitan Planning Organizations (MPOs) be afforded greater say in how federal highway funds are invested, as is done in Pennsylvania and California.
- The ILGA could direct IDOT to flex funding to transit projects or play a larger role in identifying funding for transit capital projects.
- IDOT would implement this in coordination and cooperation with transit agencies, FHWA, and MPOs.
- From a regional standpoint, CMAP could set investment dollar targets, by mode, through the long-range transportation planning process, both within the financial plan for transportation and regionally significant project selection elements.

Challenges

- The rules governing the use of federal funds are outside state control and could change.
- There are significant needs on the roadway system and the state's inability to meet federal asset condition and safety targets could limit the ability to flex funds.
- Federal funds come with more restrictions than state or local funds.
- Transportation projects supported by federal funds require a local match.

Recommendation: Investigate additional tools to leverage federal funds

In addition to supporting broader multimodal needs, the state should also explore process innovations that could improve delivery of needed investments over time. Two of these innovations could include:

Maximize use of Transportation Development Credits

As a result of a significant capital program by the Illinois Tollway, the state receives credits for local tolls paid to support the National Highway System (Appendix 3). These Transportation Development Credits (TDCs) are not "real" dollars but can serve in place of a local match, thereby allowing access to more federal funding. TDCs are currently used by transit agencies (see Appendix 4) and disadvantaged communities in the CMAP region.[17] Further investigation is needed to forecast the future creation of credits, understand the potential for a wider use of credits to the benefit of regional transit, and explore the benefits from the state's participation in a national toll credit exchange program.[18]

Broaden the mandate of the existing state entities to support transit

A state infrastructure bank (SIB) is a revolving loan fund designed to complement traditional transportation grants. These programs can provide access to lower interest rates, more flexible repayment terms, lower debt coverage ratios, and lower transaction costs. The Illinois Finance Authority (IFA) has functioned like an infrastructure bank since 2004, making loans for healthcare, education, and commercial building retrofits. Notably they were involved in the transportation improvements with CenterPoint Private Activity Bonds. In 2021 as part of the Climate and Equitable Jobs Act the state established the "Illinois Climate Bank" that is managed by IFA. A SIB would be most effective if leveraged as part of a plan to implement a carbon tax or to promote transit-oriented development, where a revenue source available to repay loans.

Appendix 1 – Summary of FHWA programs and flexibility

Program	Estimated 2021 Funding	Non-Federal Match Requirement	Percent Transferable	Program Categories Eligible as Destinations of Fund Transfer	Restrictions
CMAQ [FAST Act § 1114; 23 U.S.C. § 149]	$2.494 billion	Non-Interstate System road projects: 20% Interstate System projects: 10%	Up to 50% of apportionment	NHPP NHFP STBG HSIP TA	Set-aside for nonattainment or maintenance area for PM2.5 may not be transferred.
NHPP [FAST Act § 1106; 23 U.S.C. § 119]	$24.239 billion (sum of estimated individual state NHPP apportionments)	Non-Interstate System road projects: 20% Interstate System projects: 10%	Up to 50% of apportionment	NHFP STBG TA HSIP CMAQ	
STBG [FAST Act § 1109; 23 U.S.C. § 133]	$12.139 billion (sum of estimated individual state STBG apportionments)	Non-Interstate System road projects: 20% Interstate System projects: 10%	Up to 50% of apportionment	NHPP NHFP HSIP CMAQ	Set-asides for suballocation under 23 U.S.C. § 133(d)(1)(A), off-system bridges, and border infrastructure projects may not be transferred.
TA [FAST Act § 1109; 23 U.S.C. § 133(h)]	$850 million	Non-Interstate System road projects: 20% Interstate System projects: 10%	Up to 50% of apportionment	NHPP NHFP STBG HSIP CMAQ	Exclusive set-aside for Recreational Trails Program. TA funds suballocated under 23 U.S.C. § 133(d)(1)(A) may not be transferred.
HSIP [FAST Act § 1113; 23 U.S.C. § 148]	$2.408 billion	Non-Interstate System road projects: 20% Interstate System projects: 10%	Up to 50% of apportionment	NHPP NHFP STBG TA CMAQ	Set-asides for the Railway-Highway Crossings program and $3.5 million for safety-related activities and to operate safety-related clearinghouses may not be transferred.
NHFP [FAST Act § 1116; 23 U.S.C. § 167]	$1.487 billion (net amount after MPP set-aside)	Non-Interstate System road projects: 20% Interstate System projects: 10%	Up to 50% of apportionment	NHPP STBG TA HSIP CMAQ	Metropolitan Planning set-asides are not transferable.

CMAQ = Congestion Mitigation and Air Quality
FAST = Fixing America's Surface Transportation Act
HSIP = Highway Safety Improvement Program
MPP = Metropolitan Planning Program
NHFP = National Highway Freight Program
NHPP = National Highway Performance Program
STBG = Surface Transportation Block Grant Program
TA = Transportation Alternatives
U.S.C. = U.S. Code

Source: National Academy of Sciences

Appendix 2 – Illinois Apportionment for flexible highway funds

Program	2017	2018	2019	2020	2021	2022	2023
CMAQ (Congestion Mitigation and Air Quality)	$111,378,646	$113,686,001	$116,153,419	$118,061,702	$117,323,659	$119,957,587	$122,356,739
NHPP (National Highway Performance Program)	$803,525,053	$820,171,126	$839,914,867	$854,148,369	$848,808,799	$999,514,444	$1,019,504,733
STBG (Surface Transportation Block Grant Program)	$402,935,500	$412,227,610	$420,991,617	$428,610,365	$425,930,977	$486,250,270	$495,975,275
TA (Transportation Alternatives)	$29,260,295	$29,785,929	$29,785,929	$29,785,929	$29,785,929	$29,206,207	$49,452,045
HSIP (Highway Safety Improvement Program)	$77,466,533	$79,085,168	$80,878,820	$82,096,255	$81,480,373	$102,028,534	$104,245,906
NHFP (National Highway Freight Program)	$39,198,899	$41,977,190	$48,348,900	$53,516,633	$53,182,082	$49,306,725	$50,292,860
Total	**$1,463,764,926**	**$1,496,933,024**	**$1,536,073,552**	**$1,566,219,253**	**$1,556,511,819**	**$1,786,263,767**	**$1,841,827,558**

Source: Federal Highway Administration 2017-2023 Apportionment of Federal-Aid Highway Program Funds

Not shown – Carbon reduction, Ferry Boat Program, and State Planning and Research.

Appendix 3 – Toll Credit balance by state

State	FY20 Ending Balance	FY21 Ending Balance	FY22 Ending Balance
California	$1,685,450,238	$1,611,063,724	$1,487,060,233
Colorado	$954,061,640	$950,506,162	$888,627,931
Delaware	$27,281,239	$11,760,206	$1,340,681,336
Florida	$1,978,108,664	$2,468,060,048	$2,630,379,289
Georgia	$69,884,526	$47,861,011	$42,106,375
Illinois	$405,481,285	$1,243,586,643	$2,251,670,759
Indiana	$537,810,829	$565,316,194	$566,439,569
Kansas	$40,970,368	$68,548,762	$74,930,920
Kentucky	$14,992,904	$25,236,870	$24,667,697
Louisiana	$37,212,653	$33,124,646	$31,798,639
Maine	$471,852,628	$571,775,798	$571,775,798
Maryland	$622,733,922	$705,047,196	$576,955,721
Massachusetts	$31,780,303	$28,170,852	$20,912,092
Michigan	$118,450,839	$129,427,504	$142,043,112
Missouri	$8,645,252	$8,302,491	$8,301,975
New Hampshire	$199,912,587	$195,543,366	$188,649,682
New Jersey	$5,375,754,929	$6,990,124,938	$6,668,072,323
New York	$220,969,428	$2,733,423,455	$2,702,594,875
Ohio	$1,221,056,322	$1,173,802,167	$1,146,043,880
Oklahoma	$228,380,416	$196,096,594	$136,817,028
Pennsylvania	$4,960,085,710	$4,781,285,210	$4,666,583,459
PR-VI	$592,760,731	$573,904,289	$496,536,339
Rhode Island	$65,865,707	$82,132,077	$74,840,004
South Carolina	$136,131,399	$136,446,279	$136,445,955
Texas	$3,165,143,695	$3,152,185,400	$3,086,318,235
Vermont	$1,912,753	$1,912,753	$1,915,402
Virginia	$3,872,508,350	$4,680,003,711	$5,305,260,494
Washington	$2,296,446,702	$2,175,957,500	$3,377,306,198
West Virginia	$130,875,752	$84,819,635	$125,778,669
Total	**$29,472,521,770**	**$35,425,425,481**	**$38,771,513,989**

Source: Federal Highway Administration Center for Innovative Finance Support

Appendix 4 – Toll Credit use by transit agencies

Grantee	2018	2019	2020	2021	2022
CTA	$63,469,721	$64,917,559	$63,014,865		$84,544,894
Metra	$36,995,155	$36,828,108	$35,670,355	$36,918,715	$49,696,123
Pace	$11,106,015	$12,802,286	$8,385,124	$8,465,519	$13,715,346
Total	$111,570,891	$114,547,953	$107,070,344	$45,384,234	$147,956,363

Source: Illinois Department of Transportation

Endnotes

[1] Congressional Budget Office (CBO), "Highway Trust Fund Accounts" May 2022, https://www.cbo.gov/system/files/2022-05/51300-2022-05-highwaytrustfund.pdf.
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[4] Federal Highway Administration (FHWA), "Bipartisan Infrastructure Law - Surface Transportation Block Grant (STBG) Fact Sheet," accessed June 12, 2023, https://www.fhwa.dot.gov/bipartisan-infrastructure-law/stbg.cfm.
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[6] U.S. Department of Transportation (USDOT), "Flexible Funding for Transit Access," Transportation Planning Capacity Building, June 29, 2022, https://www.planning.dot.gov/flex.aspx.
[7] Jim Redeker et al., "Federal Funding Flexibility: Use of Federal-Aid Highway Fund Transfers by State DOTs," Transportation Research Board, 2022, https://doi.org/10.17226/26696.
[8] Redeker et al., "Federal Funding Flexibility: Use of Federal-Aid Highway Fund Transfers by State DOTs."
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